

### **III. Amendments to the Drawings**

The attached sheets of drawings includes changes to Figs. 1 and 2, and replaces prior sheet number 1/3. It is respectfully submitted no new matter has been added.

## **V. Remarks**

Reconsideration of this application in view of the above amendments and the following remarks is herein respectfully requested.

After entering this amendment, claims 1-9 remain pending and claims 10-12 have been added.

### *Allowable Subject Matter*

The undersigned acknowledges the Examiner's indication of the allowability of claims 3 – 9 if rewritten into independent form including all of the limitations of any base claims and intervening claims. Accordingly, new independent claims 10, 11 and 12 have been added incorporating the limitations of claims 8, 9 and a portion of 6.

In view of the above, it is submitted that these claims are allowable and such action is requested.

### *Objections to the Claims*

In response to the Examiners objection, claim 4 has been amended to change the phrase “a frame seat” to “a seat frame”.

### *Amendments to the Drawings*

In response to the Examiner's objection, Figures 1 and 2 of the drawings have been amended to improve clarity by revising the placement of reference numbers 1, 9, 11, and 19 and their attendant leader lines. It is respectfully submitted that no new matter has been added.

*Amendments to the Specification*

In response to the Examiner's objections, paragraph [0024] of the specification has been amended to change the phrase "the plate region 9" to "a mounting plate 9". In addition, the abstract has been revised to improve clarity and remove implied information. It is respectfully submitted that no new matter has been added to the application.

*Claim Rejections - 35 U.S.C. §103(a)*

Claims 1 and 2 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,799,970 to Enders ("Enders") in view of U.S. Patent No. 6,554,312 to Sakane ("Sakane"). Applicant respectfully traverses this rejection.

As noted by the Examiner, Enders discloses a side airbag module 10 mounted to a vehicle seat 12 by means of two bolt holes 18 and 20 in an internal structural member 22 of the vehicle seat 12. *Enders*, col. 4, lines 50 - 56. Two threaded mounting studs 80 and 82 of an inflator sleeve 34 project through two bolt holes 44 and 46 in a housing 28 of the airbag module 10. *Id.* at col. 5, lines 62 - 65. The threaded studs 80 and 82 are inserted through the bolt holes 18 and 20 of the structural member 22, thereby mounting the airbag module 10 to the structural member 22 of the seat 12. *Id.* at col. 7, lines 35 - 39 and Fig. 2. The studs 80 and 82 are secured using two nuts 120 and 122. *Id.* It should also be noted that the Examiner's "projections" 102 form part of a module cover 36 and the Examiner's "mounting member" 40 forms a part of the housing 28. See *id.* at col. 6, lines 16 - 61 and Figs. 2, and 6 - 8. The "projections" 102 and "mounting member" 40 interact solely for the assembly

of the airbag module 10 and in no way mount the airbag module 10 to the seat 12. *Id.* From this it is submitted that Enders individually and when combined with Sakane, at least fails to disclose or suggest a *snap connection* between an air-bag unit and a mounting member of a *vehicle seat*.

In that Sakane fails to disclose or suggest the snap connection of the air-bag unit with the vehicle seat which was previously noted as being absent in Enders, it must be concluded that the combination of Enders in view of Sakane cannot render the claims of the present application as obvious. The rejection under § 103 is therefore improper and should be withdrawn.


Furthermore, it is respectfully submitted that there is no motivation or suggestion to combine Sakane with Enders because Enders teaches straight stakes 102 of the cover 36 being permanently secured in openings 58 of the housing 28 by means of heating, ultrasonic welding, pneumatic welding, induction welding, fusion welding or vibration welding. *Enders*, col. 6, lines 55 – 61. On the other hand, Sakane teaches an airbag module 28 removably secured to a core 11 of a steering wheel by means of three pins 29 and each pin 29 protruding from the bottom surface of the airbag module 28, includes a hook portion 30. *Sakane*, col. 13, lines 1 – 6 and Fig. 1. The airbag module 28 is locked into place by resilient removable engagement of a locking wire 23 with the hook portions 30. *Id.* at col. 13, lines 9 – 16. Since the stakes 102 of Enders cited by the Examiner are straight without any hook portions similar to Sakane and are permanently secured in place by heating or welding, there is no motivation or suggestion to combine, as suggested by the Examiner, the removable locking wire 23 of Sakane with the cover 36 of the airbag module 10 of Enders.

In that there is no motivation or suggestion to combine the locking wire 23 of Sakane with the airbag module 10 of Enders, the rejection under § 103 is therefore improper and should be withdrawn.

*Conclusion*

In view of the above amendments and remarks, it is respectfully submitted that the present form of the claims are patentably distinguishable over the art of record and that this application is now in condition for allowance. Such action is requested.

Respectfully submitted,

  
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Attachments: 1 Sheet Replacement Drawings